



REQUESTS FOR CONDUCTING FUNCTIONAL ANALYSIS ASSESSMENT

UNDERSTANDING WHEN A FAA SHOULD BE CONDUCTED BEFORE DEVELOPMENT OF A BEHAVIOR PLAN

- **3-prongs of California Ed Code on FAA**

- If the behavior is serious, as defined by: assaultive, self-injurious or is another “pervasive, maladaptive behavior” AND
- it is interfering with mastery of IEP goals and objectives AND
- the behavioral/instructional approaches specified in the IEP have been ineffective, a functional analysis assessment must be conducted.

- **The process**

- The SELPA-approved Behavior Intervention Case Manager (BICM) conducts, or supervises the conducting of the functional analysis assessment, writes a FAA summary report and presents that information in a subsequent IEP meeting. The IEP team develops the Positive Behavioral Intervention Plan based on the FAA if they deem one is necessary following the review of the results of the FAA. All timelines for assessment process must be followed.

- **The nuances**

- *Self-injurious behavior*

Advice: Since this behavior occurs in students with severe disabilities and often requires extensive analysis to determine specific predictors for the problem behavior and requires extensive data collection to understand the student and his unique methods of getting his needs met, you would be wise to go ahead and conduct the full FAA because you probably will end up doing the FAA by the time you are done. Be sure you have the expertise to do this assessment as self-injurious behavior requires immediate systematic intervention plans based on a thorough understanding of the predictors of this behavior.

- *Repeatedly assaultive behavior*

Advice: Since each time an emergency occurs an IEP meeting must be called to discuss whether an FAA should be conducted AND an interim plan developed, AND a statement written in the IEP as to the rationale for not moving to FAA, it would be wise to conduct the FAA following a second assaultive behavioral episode. After the first assaultive behavior, if you believe the likelihood of a repeat is not great if a good behavior plan is developed, you CAN elect to simply develop a Behavior Support Plan. However, after the second episode, it becomes harder to defend not moving to a more full analysis, an FAA.

- *Student recommendation for expulsion, involuntary placement change or 11th day of suspension*

Advice: If the behavior has only occurred once, the federal requirement for a Functional Behavioral Assessment can be fulfilled by the analysis inherent in the development of the BSP (top of the form). If the behavior has been occurring regularly, and there has never been a BSP developed to address it, an FBA and BSP should be developed immediately (Also, expulsion is not possible as the IEP is not adequate in the review of a “manifestation determination” prior to expulsion.) If there is a BSP for this behavior, then obviously it has proven ineffective. Therefore if this behavior is serious, by Ed. Code definition, you must now conduct the FAA.

☞ ***What if a parent requests an FAA and we have not yet even tried a behavior support plan for behavior interfering with learning?***

- **Do It If**

- If the behavior is serious and you think you should conduct an FAA, rather than first trying the behavior support plan, follow standard assessment plan procedures and timelines following parental signature for permission to begin functional analysis assessment. This decision would be made due to the need for a very thorough review of what has already been tried, the impact of multiple medications, the complexity of issues surrounding the child (impact of handicap, level of severity of self-injurious behavior, etc.) and other variables requiring careful data collection.

- **Don't Do It If**

- If you believe that you do understand the function of the behavior and you believe a behavior support plan should be developed to both 1. teach a replacement behavior and 2. provide environmental supports to remove the need for the problem behavior because the behavior the parents are concerned about IS interfering with learning---develop the BSP as an IEP team function.

☞ ***Sample Dialogue:***

- **Do It**

- “Thank you for bringing this to my attend Mr. and Mrs. Smith. Given the severity of Johnny’s serious behavior, we would like to develop an assessment plan to complete a functional analysis assessment under the supervision of a behavior intervention case manager. (Reminder: 14 days to develop the assessment plan following the request) We will then hold an IEP meeting to review the results of our observations and data collection as to the function of his behavior. (50 days to conduct the assessment and hold the IEP meeting.) We will review the results at the IEP meeting and together develop a positive behavioral intervention plan to address this serious behavior.”

- **Not Going to Do It Now**

- “Mr. Smith, it appears you are quite concerned about Johnny’s behavior of XXXXX. Do you believe this behavior is interfering with his learning or that of his peers? Under federal law when behavior interferes with a student’s learning or that of others, the IEP team must decide if strategies should be used to address that behavior, including positive behavioral interventions, strategies and supports. We can schedule an IEP team meeting immediately and develop that plan without the lengthy data collection prior to plan development required by California Education Code for serious assaultive, self-injurious or other pervasive maladaptive behavior that has not responded to strategies the IEP team has specified to be used. With your permission, let’s schedule an IEP team meeting immediately to develop those strategies. Does that sound like what Johnny needs immediately? Development of a behavior plan everyone is obligated to implement?” (No assessment plan necessary—analysis will take place during an IEP meeting and be summarized on the BSP form.)

- If parent still insists:

“When you requested the functional analysis assessment, we offered as an alternative to develop an immediate behavior support plan because this behavior DOES appear to be interfering with his learning or that of others. This behavior has never had specific strategies specified in the IEP—a behavior support plan—which we believe is the first and immediate need Johnny has. If this BSP is unsuccessful, and we are in agreement that this behavior is serious as defined by “assaultive, self-injurious or other pervasive maladaptive behavior”, we will at that time meet as an IEP team and have a behavior intervention case manager join us so that an assessment plan to establish the function of this behavior is developed. The important thing, Mr. Smith, is that we have strategies to teach replacement behavior to Johnny and ideas on how to change the environment to meet Johnny’s needs. We are ready to develop a behavior plan right now and do not feel more data collection will aid us at this time.”

(Give parent rights, explain resolution/mediation steps if parent still in disagreement.)